



Hain Capital Group, LLC
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October 23, 2019

Edward L. Schnitzer, Attorney
Montgomery McCracken Walker & Rhoads LLP
437 Madison Avenue
New York, NY 10022

Dear Ed,

On or about January 29, 2019, Hain Capital Investors Master Fund, Ltd. (“**Hain**”) purchased Claims Nos. 7960 and 7967 (the “**Transferred Claims**”) from BST International, Ltd. (“**BST**”) pursuant to a certain Assignment of Claim (the “**Assignment**”). See Notice Of Transfer Of Claim Other Than For Security [Dkt No. 2216].

On or about September 26, 2019, the Debtors filed their Tenth Omnibus Objection to Proofs of Claim (To Reclassify Claims) which included objections to the Transferred Claims (the “**Objection**”).

On or about October 1, 2019 a portion of the claim was allowed [Dkt No. 5298] and a portion of the claim remained unresolved and outstanding, subject to the respective rights of the parties Id. at Fn. 2 (the “**Remaining Claims**”).

On or about October 7, 2019, Hain sent a written demand to BST relating to the Remaining Claims. Pursuant to paragraph 5 of the Assignment, BST has the right to defend the Remaining Claims in light of the Objection.

Nothing in this statement or the Demand waives any rights Hain has with respect to the Assignment, and all such rights are hereby preserved.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Koltai".

Robert J. Koltai
Manager